

# HARPER & SHELL

Associates

William P. Harper  
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State Water Resource Control Board  
Attn: Todd Thompson, Associate Water Resource Control Engineer  
Division of Water Quality  
P.O. Box 944213  
Sacramento, CA 94244-2130

Dear Mr. Thompson:

I respectfully submit the following comments in response to the Draft EIR for General Waste Discharge Requirements for Biosolids Land Application. I am a Chemical Engineer by professional training with over thirty years of experience working with technical and environmental issues. It is with this background that I make the following comments. There are numerous areas in which your draft EIR does not adequately address issues arising from the disposal of sewage sludge on farm land in California, but I wish to address one specific area.

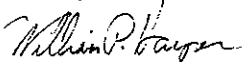
**The draft EIR is seriously flawed and totally inadequate to support inclusion in the General Order (GO) disposal of sewage sludge/industrial waste on irrigated farm lands and/or over usable water aquifers.**

Supporting information in the draft EIR shows 148,000 dry tons per year being applied in Kern County. The overwhelming majority of this material is imported into the county from southern California. The southern California waste systems co-mingle large volumes of industrial wastes with their sewage. This multiplicity of industrial waste streams contain high levels of heavy metals and other dangerous industrial wastes. The studies cited in the draft EIR do not evaluate in any meaningful way waste streams containing these high levels of industrial wastes. Consequently, the conclusion of these studies (which are questionable in themselves), provide no meaningful information regarding the types of sledges/industrial wastes being imported from southern California into Kern County. This fundamental deficiency in the draft EIR makes it impossible to make findings that support including in the GO disposal of sewage sludge/industrial waste from southern California on irrigated farm lands or over usable water aquifers. Until meaningful studies are conducted dealing with the specific waste streams from southern California, this disposal must be excluded from the GO.

25-1

Thank you for the opportunity to comment.

Sincerely,



William P. Harper

## **Responses to Comments from Harper & Shell Associates**

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- 25-1. Under the Clean Water Act, all POTWs have a pretreatment program that monitors and controls pollutants coming into from industrial sources. Larger POTWs, such as in southern California, have extensive pretreatment programs that include extensive monitoring beyond what is required. Larger facilities also have less of a chance of having drastic spikes in toxics because of the sheer size of the facility. Therefore, there is no reason to conclude that biosolids from southern California are of lesser quality than from other areas.

Furthermore, Master Responses 13 and 14 generally describe the basis for the analysis of potential surface and groundwater quality impacts in the EIR. These responses also describe how EPA's risk assessments conducted for the Part 503 regulations, additional protective measures included in the proposed GO, and the authority of RWQCB staff to use monitoring and professional judgment would protect water quality.